

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Nishikawa Standard Company
324 Morrow Street
Topeka, Indiana 46571**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 087-7182-00031	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 12, 2001

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary extruded rubber seals manufacturing source.

Responsible Official:	Mr. Mark Griffin
Source Address:	324 Morrow Street, Topeka, Indiana 46571
Mailing Address:	324 Morrow Street, Topeka, Indiana 46571
Phone Number:	(219) 593-2156
SIC Code:	3061
County Location:	Lagrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) spray booth, identified as Line 2, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) spray booth, identified as Line 3, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) spray booth, identified as Line 5, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) spray booth, identified as Line 6, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one

- (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (f) One (1) silicone application line, identified as line 1, emission unit X001, constructed in 1993, equipped with four (4) drip applicators and one (1) drying oven rated at 4.9 million British thermal units per hour, and exhausting at stacks PEV-A8 and PEV-A16, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour.
 - (g) Seven (7) CV finishing touchup stations, identified as emission unit X003, constructed in 1990, equipped with seven (7) electric dryers and exhausting at stack PEF-D2, maximum capacity: 2 pounds of coating per hour per station.
 - (h) Two (2) CV finishing touchup stations, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
 - (i) One (1) silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
 - (j) One (1) urethane application line, identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
 - (k) One (1) urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns and one (1) blown air dryer, one (1) 1.0 MM Btu/hr natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
 - (l) One (1) urethane application line, identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
 - (m) One (1) portable spray booth for urethane coating, identified as emission unit X024, constructed in 1996, equipped with one (1) high volume, low pressure (HVLP) spray applicators and exhausting to a dry filter, capacity: 10 grams of coating per minute per gun.
 - (n) One (1) waterborne urethane coating booth, identified as Line 4, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
 - (o) One (1) waterborne urethane coating booth, identified as Line 7, equipped with dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
 - (p) One (1) waterborne urethane coating booth, identified as Small Robot, equipped with dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
 - (q) One (1) CV extrusion line, identified as line 1, emission unit X005, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to

stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.

- (r) One (1) CV extrusion line, identified as line 2, emission unit X006, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (s) One (1) CV extrusion line, identified as line 3, emission unit X007, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (t) One (1) CV extrusion line, identified as line 4, emission unit X008, constructed in 1988, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (u) One (1) CV extrusion line, identified as line 5, emission unit X009, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A9, PEV-A10 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (v) One (1) CV extrusion line, identified as line 6, emission unit X010, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1, PEV-A15 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (w) One (1) CV extrusion line, identified as line 7, emission unit X011, constructed in 1991, equipped with three (3) extruders, three (3) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1 and PEV-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per hour.
- (x) One (1) CV extrusion line, identified as line 8, emission unit X012, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-05 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A4, PEV-A3 and PEV-A2, maximum

capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.

- (y) One (1) CV extrusion line, identified as line 9, emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-06 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (z) One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 1987, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B7, the deodorizing furnace exhausting to stack PEV-B9, the curing oven exhausting to stack PEF-B3, the bead recovery dryer exhausting to stack PEV-B7, and the bead blow off station exhausting to stack PEV-B8, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (aa) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (bb) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (cc) One (1) mixing department, identified as X017, constructed in 1987, equipped with one (1) rubber weigh station, one (1) pelletizer line, two (2) mixing mills, one (1) talcing system, one (1) talc sifter unit, and one (1) pelletizing vacuum, all exhausting to a large baghouse identified as CE-01 and exhausting at stack PEF-A9, capacity: 562 pounds of rubber per

hour and 4.8 pounds of talc per hour.

- (dd) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station, two (2) mixing mills, and one (1) Barwell pelletizer line, all exhausting to a small baghouse identified as CE-02 and exhausting at stack PEF-A10, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Pellet Lines Mixing Mills A, C, D and E [326 IAC 6-3]
- (b) Pelletizers and Tumblers [326 IAC 6-3]
- (c) Dango Mixing Mills B and F [326 IAC 6-3]
- (d) Color Mixing Mill [326 IAC 6-3]
- (e) SDM Finishing Drill and Fastener Inserter Units [326 IAC 6-3]
- (f) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (g) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (h) Dango Barwell Extruders [326 IAC 6-3]
- (i) Polymer Block Cutting Station [326 IAC 6-3]
- (j) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (k) Weld Shop Equipment [326 IAC 6-3]
- (l) CV Annealing Oven [326 IAC 6-3]
- (m) Silicone Coating Mixing Station [326 IAC 6-3]
- (n) Die Room Metalworking Equipment [326 IAC 6-3]
- (o) SDM Mezzanine Units [326 IAC 6-3]
- (p) Building B Maintenance Shotblast Unit [326 IAC 6-3]
- (q) Six (6) Building A HVAC Units [326 IAC 6-3]
- (r) CV Mezzanine Units [326 IAC 6-3]
- (s) Chemical Storage Room Mixing Station [326 IAC 6-3]
- (t) SDM Finishing Drill and Size Machines [326 IAC 6-3]
- (u) Building C HVAC Unit [326 IAC 6-3]

(v) Mixing Department "Safety Kleen" Unit [326 IAC 8-3]

(w) Maintenance "Safety-Kleen" Unit [326 IAC 8-3]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22); and

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a

claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office

Telephone Number: 219-245-4870

Facsimile Number: 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that

either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or

other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed

to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance
copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be

required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable require-

ments. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326

IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall

be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) spray booth, identified as Line 2, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) spray booth, identified as Line 3, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) spray booth, identified as Line 5, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) spray booth, identified as Line 6, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (f) One (1) silicone application line, identified as line 1, emission unit X001, constructed in 1993, equipped with four (4) drip applicators and one (1) drying oven rated at 4.9 million British thermal units per hour, and exhausting at stacks PEV-A8 and PEV-A16, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour.
- (g) Seven (7) CV finishing touchup stations, identified as emission unit X003, constructed in 1990, equipped with seven (7) electric dryers and exhausting at stack PEF-D2, maximum capacity: 2 pounds of coating per hour per station.
- (h) Two (2) CV finishing touchup stations, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (i) One (1) silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (j) One (1) urethane application line, identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (k) One (1) urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns and one (1) blown air dryer, one (1) 1.0 MM Btu/hr natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]: (continued)

- (l) One (1) urethane application line, identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (m) One (1) portable spray booth for urethane coating, identified as emission unit X024, constructed in 1996, equipped with one (1) high volume-low pressure (HVLP) spray applicators and exhausting to a dry filter, capacity: 10 grams of coating per minute per gun.
- (n) One (1) waterborne urethane coating booth, identified as Line 4, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (o) One (1) waterborne urethane coating booth, identified as Line 7, equipped with dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- (p) One (1) waterborne urethane coating booth, identified as Small Robot, equipped with dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-2]

- (a) Pursuant to CP 087-9388-00031, issued on January 28, 1999, the VOC delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the VOC recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply to that emission unit.
- (b) Any change or modification at the spray booths (Lines 2, 3, 5 and 6), two (2) CV finishing touchup stations (X004), urethane application lines (X020, X021, X023), the portable spray booth or the three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) that increases the potential to emit VOC at the facility to twenty-five (25) tons per year or more may cause the source to become subject to 326 IAC 8-1-6 and prior approval is required.
- (c) Pursuant to 326 IAC 8-1-6, New facilities; General reduction requirements, the best available control technology (BACT) for the seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019) shall be as follows:
 - (1) The total VOC usage at the one (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) shall be limited to less than 183 tons per consecutive twelve (12) month period. This is a BACT limit for the seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019). All coating and application emission units are included in this limit to limit VOC from the entire source to less than 250 tons per year and make 326 IAC 2-2 (PSD) not applicable.
 - (2) All coating, urethane and silicone application devices at these facilities or shall be

drip; high volume, low pressure (HVLP) spray guns; or a coating application device at least as efficient. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (3) All VOC containing containers shall be kept covered when not in use.
- (d) The VOC limitation in this BACT, in combination with VOC emissions of 63.5 tons per year from extruding, curing, mixing and milling, 2.0 tons per year from insignificant activities and 0.911 tons per year from combustion, will limit the total VOC emitted at this source to less than 250 tons per year and this source will remain a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

- (a) Pursuant to CP 087-9388-00031, issued on January 28, 1999, each individual hazardous air pollutant (HAP) delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the amount of that HAP recovered, shall be limited to less than ten (10) tons per consecutive twelve (12) month period.
- (b) Pursuant to CP 087-9388-00031, issued on January 28, 1999, any combination of HAPs delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the total HAPs recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the one (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the spray booths exhausting to those dry filters are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks (PEV-A27, PEV-A28, PEV-A29 and PEV-A30) while one (1) or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;

- (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and the HAP emission limits established in Condition D.1.2.
 - (1) The amount and HAP content of each coating material and solvent used at the one (1) spray coating line, identified as emission unit X025. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The individual and total HAP usage for each month; and
 - (4) The weight of individual and total HAPs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (q) One (1) CV extrusion line, identified as line 1, emission unit X005, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (r) One (1) CV extrusion line, identified as line 2, emission unit X006, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (s) One (1) CV extrusion line, identified as line 3, emission unit X007, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (t) One (1) CV extrusion line, identified as line 4, emission unit X008, constructed in 1988, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (u) One (1) CV extrusion line, identified as line 5, emission unit X009, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A9, PEV-A10 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (v) One (1) CV extrusion line, identified as line 6, emission unit X010, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1, PEV-A15 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]: (continued)

- (w) One (1) CV extrusion line, identified as line 7, emission unit X011, constructed in 1991, equipped with three (3) extruders, three (3) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1 and PEV-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per hour.
- (x) One (1) CV extrusion line, identified as line 8, emission unit X012, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-05 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A4, PEV-A3 and PEV-A2, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (y) One (1) CV extrusion line, identified as line 9, emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-06 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (z) One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 1987, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B7, the deodorizing furnace exhausting to stack PEV-B9, the curing oven exhausting to stack PEF-B3, the bead recovery dryer exhausting to stack PEV-B7, and the bead blow off station exhausting to stack PEV-B8, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (aa) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]: (continued)

- (bb) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X005) shall not exceed 0.882 pound per hour when operating at a process weight rate of 202 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X006) shall not exceed 0.882 pound per hour when operating at a process weight rate of 202 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X007) shall not exceed 0.882 pounds per hour when operating at a process weight rate of 202 pounds per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X008) shall not exceed 0.882 pounds per hour when operating at a process weight rate of 202 pounds per hour.
- (e) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X009) shall not exceed 1.40 pounds per hour when operating at a process weight rate of 402 pounds per hour.
- (f) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X010) shall not exceed 1.40 pounds per hour when operating at a process weight rate of 402 pounds per hour.
- (g) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X011) shall not exceed 1.83 pounds per hour when operating at a process weight rate of 602 pounds per hour.
- (h) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X012) shall not exceed 1.40 pounds per hour when operating at a process weight rate of 402 pounds per hour.
- (i) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X013) shall not exceed 1.40 pounds per hour when operating

at a process weight rate of 402 pounds per hour.

- (j) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the SDM EA extrusion line (X014) shall not exceed 2.91 pounds per hour when operating at a process weight rate of 1,200 pounds per hour.
- (k) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the SDM EB extrusion line (X015) shall not exceed 2.91 pounds per hour when operating at a process weight rate of 1,200 pounds per hour.
- (l) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the SDM EC extrusion line (X016) shall not exceed 2.91 pounds per hour when operating at a process weight rate of 1,200 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Particulate Matter (PM)

The fabric filters (CE-03 and CE-04) for PM control shall be in operation and control emissions from the all facilities listed in this section as exhausting to that filter at all times that the facilities are in operation.

SECTION D.3

FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (cc) One (1) mixing department, identified as X017, constructed in 1987, equipped with one (1) rubber weigh station, one (1) pelletizer line, two (2) mixing mills, one (1) talcing system, one (1) talc sifter unit, and one (1) pelletizing vacuum, all exhausting to a large baghouse identified as CE-01 and exhausting at stack PEF-A9, capacity: 562 pounds of rubber per hour and 4.8 pounds of talc per hour.
- (dd) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station, two (2) mixing mills, and one (1) Barwell pelletizer line, all exhausting to a small baghouse identified as CE-02 and exhausting at stack PEF-A10, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the one (1) mixing department (X017) shall not exceed 1.76 pounds per hour when operating at a process weight rate of 567 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each facility at the one (1) mixing department (X018) shall not exceed 1.63 pounds per hour when operating at a process weight rate of 503 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Particulate Matter (PM)

The two (2) baghouses (CE-01 and CE-02) for PM control shall be in operation and control emissions from the mixing departments at all times that the mixing department exhausting to that baghouse is in operation.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (a) Pellet Lines Mixing Mills A, C, D and E [326 IAC 6-3]
- (b) Pelletizers and Tumblers [326 IAC 6-3]
- (c) Dango Mixing Mills B and F [326 IAC 6-3]
- (d) Color Mixing Mill [326 IAC 6-3]
- (e) SDM Finishing Drill and Fastener Insetter Units [326 IAC 6-3]
- (f) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (g) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (h) Dango Barwell Extruders [326 IAC 6-3]
- (i) Polymer Block Cutting Station [326 IAC 6-3]
- (j) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (k) Weld Shop Equipment [326 IAC 6-3]
- (l) CV Annealing Oven [326 IAC 6-3]
- (m) Silicone Coating Mixing Station [326 IAC 6-3]
- (n) Die Room Metalworking Equipment [326 IAC 6-3]
- (o) SDM Mezzanine Units [326 IAC 6-3]
- (p) Building B Maintenance Shotblast Unit [326 IAC 6-3]
- (q) Six (6) Building A HVAC Units [326 IAC 6-3]
- (r) CV Mezzanine Units [326 IAC 6-3]
- (s) Chemical Storage Room Mixing Station [326 IAC 6-3]
- (t) SDM Finishing Drill and Size Machines [326 IAC 6-3]
- (u) Building C HVAC Unit [326 IAC 6-3]
- (v) Mixing Department "Safety Kleen" Unit [326 IAC 8-3]
- (w) Maintenance "Safety-Kleen" Unit [326 IAC 8-3]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each of the insignificant activities shall not exceed allowable PM emission rate based on the following equations:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.4.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the two (2) insignificant cold cleaners shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Determination Requirements

D.4.3 Particulate Matter (PM)

All PM control devices shall be in operation and control emissions from all facilities exhausting to those control devices at all times that the facilities exhausting to those control devices are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 087-7182-00031

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 087-7182-00031

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - ☐ The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 087-7182-00031
Facility: One (1) spray line (X025)
Parameter: VOC usage
Limit: Less than 25 tons per consecutive twelve (12) month period

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 087-7182-00031
Facility: One (1) spray line (X025)
Parameter: Total HAP usage
Limit: Less than 25 tons per consecutive twelve (12) month period

YEAR: _____

Month	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 087-7182-00031
Facility: One (1) spray line (X025)
Parameter: Individual HAP usage
Limit: Less than 10 tons per consecutive twelve (12) month period

YEAR: _____

Month	Individual HAPs (tons)	Individual HAPs (tons)	Individual HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 087-7182-00031
Facilities: Spray coating line (X025), spray booths (Lines 2, 3, 5 and 6), silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), urethane application lines (X020, X021, X023), portable spray booth and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot)
Parameter: Total VOC usage
Limit: Less than 183 tons per consecutive twelve (12) month period

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Nishikawa Standard Company
Source Address: 324 Morrow Street, Topeka, Indiana 46571
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 087-7182-00031

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Nishikawa Standard Company
Source Location: 324 Morrow Street, Topeka, Indiana 46571
County: Lagrange
SIC Code: 3061
Operation Permit No.: T 087-7182-00031
Permit Reviewer: CarrieAnn Ortolani

On November 29, 2000, the Office of Air Quality (OAQ) had a notice published in the Lagrange Standard, Lagrange, Indiana, stating that Nishikawa Standard Company had applied for a Part 70 Operating Permit to operate an extruded rubber seals manufacturing source with baghouses and dry filters as controls. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On January 8, 2001, Allen Frutig of Nishikawa Standard Company submitted comments on the proposed Part 70 Operating Permit. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.):

Comment 1:

Condition D.1.4, Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices.

We would request that this condition be amended to read as follows: "A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit is required for the particulate control devices used for these emission units." We have not been able to identify any maintenance on the units necessary to ensure compliance with the applicable regulations and, therefore, we believe that preventive maintenance should be limited to the control device.

Response 1:

If lack of proper maintenance could cause or contribute to a violation of any limitation on emissions or potential to emit, then a Preventive Maintenance Plan (PMP) will be required even if there is no control device. In this case, a malfunction of the spray guns can result in a violation of 326 IAC 6-3-2 and/or 326 IAC 8-1-6. A PMP is required on coating operations because what is being coated and which coatings are used in the process vary continuously in most processes. Therefore, the process weight rate and, subsequently, the allowable emission rate may constantly change. The PMP gives OAQ the reasonable assurance that the coating operations continuously comply with 326 IAC 6-3-2. Condition D.1.1(c)(2) requires that, in order to comply with 326 IAC 8-1-6, all coating, urethane and silicone application devices at seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019) shall be drip; high volume, low pressure (HVLP) spray guns; or a coating application device at least as efficient. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-

tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. Since there is a control device for PM on many, but not all, of the facilities listed in Section D.1, the PMP is required for the emission units and their control devices. The definition of HVLP spray has been added to Condition D.1.1 as shown below. There are no other changes to the permit as a result of this comment.

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-2]

- (a) Pursuant to CP 087-9388-00031, issued on January 28, 1999, the VOC delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the VOC recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply to that emission unit.
- (b) Any change or modification at the spray booths (Lines 2, 3, 5 and 6), two (2) CV finishing touchup stations (X004), urethane application lines (X020, X021, X023), the portable spray booth or the three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) that increases the potential to emit VOC at the facility to twenty-five (25) tons per year or more may cause the source to become subject to 326 IAC 8-1-6 and prior approval is required.
- (c) Pursuant to 326 IAC 8-1-6, New facilities; General reduction requirements, the best available control technology (BACT) for the seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019) shall be as follows:
 - (1) The total VOC usage at the one (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) shall be limited to less than 183 tons per consecutive twelve (12) month period. This is a BACT limit for the seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019). All coating and application emission units are included in this limit to limit VOC from the entire source to less than 250 tons per year and make 326 IAC 2-2 (PSD) not applicable.
 - (2) All coating, urethane and silicone application devices at these facilities or shall be drip; high volume, low pressure (HVLP) spray guns; or a coating application device at least as efficient. **HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.**
 - (3) All VOC containing containers shall be kept covered when not in use.
- (d) The VOC limitation in this BACT, in combination with VOC emissions of 63.5 tons per year from extruding, curing, mixing and milling, 2.0 tons per year from insignificant activities and 0.911 tons per year from combustion, will limit the total VOC emitted at this source to less than 250 tons per year and this source will remain a minor source pursuant to 326 IAC 2-2,

Prevention of Significant Deterioration.

Comment 2:

Please note that Mr. William Burga, Jr. is no longer employed with Nishikawa Standard Company. The company's current authorized representative is Mr. Mark Griffin, Executive Vice President.

Response 2:

Section A.1 is revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary extruded rubber seals manufacturing source.

Responsible Official:	William Burga, Jr. Mr. Mark Griffin
Source Address:	324 Morrow Street, Topeka, Indiana 46571
Mailing Address:	324 Morrow Street, Topeka, Indiana 46571
Phone Number:	(219) 593-2156
SIC Code:	3061
County Location:	Lagrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

The name of IDEM's "Office of Air Management" was changed to "Office of Air Quality" on January 1, 2001. All references to "Office of Air Management" in the permit have been changed to "Office of Air Quality" and all references to "OAM" have been changed to "OAQ."

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Nishikawa Standard Company
Source Location: 324 Morrow Street, Topeka, Indiana 46571
County: Lagrange
SIC Code: 3061
Operation Permit No.: T 087-7182-00031
Permit Reviewer: CarrieAnn Ortolani

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Nishikawa Standard Company relating to the operation of an extruded rubber seals manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) spray booth, identified as Line 2, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) spray booth, identified as Line 3, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) spray booth, identified as Line 5, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) spray booth, identified as Line 6, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (f) One (1) silicone application line, identified as line 1, emission unit X001, constructed in 1993, equipped with four (4) drip applicators and one (1) drying oven rated at 4.9 million British thermal units per hour, and exhausting at stacks PEV-A8 and PEV-A16, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour.
- (g) Seven (7) CV finishing touchup stations, identified as emission unit X003, constructed in 1990, equipped with seven (7) electric dryers and exhausting at stack PEF-D2, maximum capacity: 2 pounds of coating per hour per station.
- (h) Two (2) CV finishing touchup stations, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (i) One (1) silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (j) One (1) urethane application line, identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (k) One (1) urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns and one (1) blown air dryer, one (1) 1.0 MM Btu/hr natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
- (l) One (1) urethane application line, identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (m) One (1) portable spray booth for urethane coating, identified as emission unit X024, constructed in 1996, equipped with one (1) high volume, low pressure (HVLP) spray applicators and exhausting to a dry filter, capacity: 10 grams of coating per minute per gun.
- (n) One (1) waterborne urethane coating booth, identified as Line 4, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (o) One (1) waterborne urethane coating booth, identified as Line 7, equipped with dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- (p) One (1) waterborne urethane coating booth, identified as Small Robot, equipped with dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.

- (q) One (1) CV extrusion line, identified as line 1, emission unit X005, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (r) One (1) CV extrusion line, identified as line 2, emission unit X006, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (s) One (1) CV extrusion line, identified as line 3, emission unit X007, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (t) One (1) CV extrusion line, identified as line 4, emission unit X008, constructed in 1988, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (u) One (1) CV extrusion line, identified as line 5, emission unit X009, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A9, PEV-A10 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (v) One (1) CV extrusion line, identified as line 6, emission unit X010, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1, PEV-A15 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (w) One (1) CV extrusion line, identified as line 7, emission unit X011, constructed in 1991, equipped with three (3) extruders, three (3) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1 and PEV-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per hour.

- (x) One (1) CV extrusion line, identified as line 8, emission unit X012, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-05 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A4, PEV-A3 and PEV-A2, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (y) One (1) CV extrusion line, identified as line 9, emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-06 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (z) One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 1987, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B7, the deodorizing furnace exhausting to stack PEV-B9, the curing oven exhausting to stack PEF-B3, the bead recovery dryer exhausting to stack PEV-B7, and the bead blow off station exhausting to stack PEV-B8, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (aa) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (bb) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour,

400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.

- (cc) One (1) mixing department, identified as X017, constructed in 1987, equipped with one (1) rubber weigh station, one (1) pelletizer line, two (2) mixing mills, one (1) talcing system, one (1) talc sifter unit, and one (1) pelletizing vacuum, all exhausting to a large baghouse identified as CE-01 and exhausting at stack PEF-A9, capacity: 562 pounds of rubber per hour and 4.8 pounds of talc per hour.
- (dd) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station, two (2) mixing mills, and one (1) Barwell pelletizer line, all exhausting to a small baghouse identified as CE-02 and exhausting at stack PEF-A10, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Pellet Lines Mixing Mills A, C, D and E
- (b) Pelletizers and Tumblers
- (c) Dango Mixing Mills B and F
- (d) Color Mixing Mill
- (e) SDM Finishing Drill and Fastener Insetter Units
- (f) Mold Tech Repair Sandblast Unit
- (g) Mold Tech Repair Weld and Metalworking Equipment
- (h) Dango Barwell Extruders
- (i) Polymer Block Cutting Station
- (j) Scrap Cardboard Bailing Unit
- (k) Weld Shop Equipment
- (l) CV Annealing Oven
- (m) Silicone Coating Mixing Station
- (n) Die Room Metalworking Equipment
- (o) SDM Mezzanine Units

- (p) Building B Maintenance Shotblast Unit
- (q) Six (6) Building A HVAC Units
- (r) CV Mezzanine Units
- (s) Chemical Storage Room Mixing Station
- (t) SDM Finishing Drill and Size Machines
- (u) Building C HVAC Unit
- (v) Mixing Department "Safety Kleen" Unit
- (w) Maintenance "Safety-Kleen" Unit
- (x) Six (6) Building A Space Heaters
- (y) Three (3) Building B Air Make-up Units
- (z) Building C Mold Press
- (aa) Chemical Storage Room
- (bb) Five (5) Building C Space Heaters
- (cc) Building D Molding Presses
- (dd) Six (6) Building A Air Make-up Units
- (ee) Two (2) Building D Air Make-up Units

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 087-8661-00031, issued on October 2, 1997;
- (b) CP 087-9388-00031, issued on January 28, 1999; and
- (c) SSM 087-12244-00031, issued on July 19, 2000.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 15, 1996. Additional information was received on December 9, 1996, March 25, 1998, October 28, 1999, January 10, 2000, April 27, 2000, August 20, 2000, and November 13, 2000.

A notice of completeness letter was mailed to the source on January 2, 1997.

Emission Calculations

See pages 1 through 11 of 11 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	53.4
PM ₁₀	54.4
SO ₂	0.098
VOC	436
CO	14.0
NO _x	16.6

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Benzene	0.074

HAPs	Potential To Emit (tons/year)
Dichlorobenzene	0.0002
Formaldehyde	0.013
Hexane	43.3
Toluene	19.4
Lead	0.00008
Cadmium	0.0002
Chromium	0.0005
Manganese	0.00006
Nickel	0.0006
Xylene	45.5
MIBK	5.41
Glycol Ethers	5.03
Trichloroethane	0.023
2-Butanone (MEK)	0.399
Acetophenone	0.005
Aniline	0.195
bis(2-Ethylhexyl)phthalate	0.197
Chloroethane	0.077
Chloromethane	0.338
Cumene	0.346
Ethyl Acrylate	1.78
Methylene Chloride	6.31
1,4 Dichlorobenzene	0.0001
2-Methylphenol	0.0001
Acetaldehyde	0.001
Biphenyl	0.001
Carbon Disulfide	20.8
Carbonyl Sulfide	0.146
Dibenzofuran	0.00001
Dimethylphthalate	0.00001
Epichlorohydrin	0.006

HAPs	Potential To Emit (tons/year)
Ethylbenzene	0.009
Isooctane	0.002
Naphthalene	0.017
t-Butyl Methyl Ether	0.00003
Tetrachloroethene	0.018
Phenol	0.484
Styrene	0.001
TOTAL	150

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	12.3
PM ₁₀	12.3
SO ₂	not reported
VOC	43.9
CO	0.933
NO _x	2.50
HAPs	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) spray coating line (X025)	0.126	0.250	0.013	25.1	1.84	2.19	Single HAP <10 Total HAPs < 25
One (1) spray booth (Line 2)	1.39	1.39	0.0	1.80	0.0	0.0	0.05
One (1) spray booth (Line 3)	1.39	1.39	0.0	1.80	0.0	0.0	0.05
One (1) spray booth (Line 5)	2.78	2.78	0.0	3.59	0.0	0.0	0.10
One (1) spray booth (Line 6)	2.78	2.78	0.0	3.59	0.0	0.0	0.10
One (1) silicone application line (X001)	0.041	0.163	0.013	89.9	1.80	2.15	13.3
Seven (7) CV finishing touchup stations (X003)	0.00	0.00	0.00	54.0	0.00	0.00	8.06
Two (2) CV finishing touchup stations (X004)	0.00	0.00	0.00	15.4	0.00	0.00	2.30
One (1) CV extrusion line (X005)	0.692	0.739	0.005	2.37	0.695	0.827	3.10
One (1) CV extrusion line (X006)	0.692	0.739	0.005	2.37	0.695	0.827	3.10
One (1) CV extrusion line (X007)	0.692	0.739	0.005	2.37	0.695	0.827	3.10
One (1) CV extrusion line (X008)	0.692	0.739	0.005	2.37	0.695	0.827	3.10
One (1) CV extrusion line (X009)	0.689	0.729	0.004	4.68	0.585	0.696	6.19

	Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) CV extrusion line (X010)	0.689	0.729	0.004	4.68	0.585	0.696	6.19
One (1) CV extrusion line (X011)	0.689	0.729	0.004	7.00	0.585	0.696	9.29
One (1) CV extrusion line (X012)	0.779	0.819	0.004	11.1	0.585	0.696	10.7
One (1) CV extrusion line (X013)	0.779	0.819	0.004	11.1	0.585	0.696	10.7
One (1) SDM EA extrusion line (X014)	0.871	0.951	0.008	4.12	1.17	1.39	1.51
One (1) SDM EB extrusion line (X015)	0.871	0.951	0.008	4.12	1.17	1.39	1.51
One (1) SDM EC extrusion line (X016)	0.871	0.951	0.008	4.12	1.17	1.39	1.51
One (1) mixing department (X017)	0.046	0.046	0.00	1.09	0.00	0.00	0.345
One (1) mixing department (X018)	0.034	0.034	0.00	0.810	0.00	0.00	0.256
One (1) silicone application line (X019)	0.117	0.167	0.005	115	0.736	0.876	17.1
One (1) urethane application line (X020)	0.912	0.912	0.00	10.7	0.00	0.00	0.58
One (1) urethane application line (X021)	0.468	0.493	0.003	5.38	0.368	0.438	0.29

	Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) urethane application line (X023)	0.912	0.912	0.00	10.7	0.00	0.00	0.58
One (1) portable spray booth (X024)	0.009	0.009	0.00	2.14	0.00	0.00	0.12
One (1) waterborne urethane coating booth (Line 4)	0.155	0.155	0.00	1.81	0.00	0.00	0.87
One (1) waterborne urethane coating booth (Line 7)	0.164	0.164	0.00	19.3	0.00	0.00	2.61
One (1) waterborne urethane coating booth (Small Robot)	0.018	0.018	0.00	2.14	0.00	0.00	0.29
Insignificant Activities	10.0	10.0	1.00	2.00	2.00	2.00	1.00
Total Emissions	30.3	31.3	1.10	< 250	16.0	18.6	133

- (a) The potential to emit VOC from the surface coating at the one (1) spray coating line (X025) is limited to less than twenty-five (25) tons per year. With combustion emissions at that spray line, the potential to emit VOC is 25.1 tons per year. The potential to emit of each HAP is limited to less than ten (10) tons per year and the potential to emit of any combination of HAPs is limited to less than twenty-five (25) tons per year.
- (b) The PM emissions in this table are an overestimate of the potential to emit PM, because potential to emit PM from units exhausting to the same control were made equivalent to the potential to emit for each individual unit.
- (c) The source will limit the total PTE of VOC to less than 250 tons per year by limiting the PTE from the total of all coating and application stations to less than 183 tons per year pursuant to 326 IAC 8-1-6, New facilities; General reduction requirements.

County Attainment Status

The source is located in Lagrange County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lagrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Lagrange County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.540), Subpart BBB, because the source is not manufacturing

rubber tires.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460, Subpart T) is not applicable to the insignificant "Safety Kleen" units because they do not use halogenated solvents.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), the total VOC usage from all coating and application emission units shall be limited to less than 183 tons per consecutive twelve (12) month period. In combination with VOC emissions of 63.5 tons per year from extruding, curing, mixing and milling, 2.0 tons per year from insignificant activities and 0.911 tons per year from combustion, the total VOC emitted at this source will be less than 250 tons per year and this source will remain a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

326 IAC 2-4.1-1 (New Source Toxics Control)

The one (1) spray coating line identified as X025, one (1) spray booth identified as Line 2, one (1) spray booth identified as Line 3, one (1) spray booth identified as Line 5, one (1) spray booth identified as Line 6, one (1) urethane application line identified as X023, one (1) waterborne urethane coating line identified as Line 4, one (1) waterborne urethane coating line identified as Line 7, and one (1) waterborne urethane coating booth identified as Small Robot were all constructed during or after 1997. Of these facilities, only the one (1) spray coating line, identified as X025, has

a potential to emit ten (10) tons per or more of any individual HAP or twenty-five (25) tons per year of any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, can only be applicable to the one (1) spray coating line, identified as X025. Pursuant to CP 087-9388-00031, issued on January 28, 1999, the potential to emit each individual HAP from this facility is limited to less than ten (10) tons per consecutive twelve (12) month period and the potential to emit any combination of HAPs from this facility is limited to less than twenty-five (25) tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) from the one (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the four (4) spray booths (Lines 2, 3, 5 and 6) are in operation, in order to comply with this limit.

- (b) The particulate matter (PM) from the insignificant pellet lines mixing mills A, C, D and E, pelletizers and tumblers, Dango mixing mills B and F, color mixing mill, SDM finishing drill and fastener insetter units, mold tech repair sandblast unit, mold tech repair weld and metalworking equipment, Dango barwell extruders, polymer block cutting station, scrap cardboard bailing unit, weld shop equipment, CV annealing oven, silicone coating mixing station, die room metalworking equipment, SDM mezzanine units, Building B maintenance sandblast unit, six (6) Building A HVAC units, CV mezzanine units, chemical storage room mixing station, SDM finishing drill and size machines, and Building C HVAC unit shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty

thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

All PM control devices shall be in operation and control emissions from all facilities exhausting to those control devices at all times that the facilities exhausting to those control devices are in operation.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X005) shall not exceed 0.882 pound per hour when operating at a process weight rate of 202 pounds per hour.

The fabric filter (CE-03) connected to the feed hopper and duster shall be in operation at all times the feed hopper and duster are in operation, in order to comply with this limit. The PM emissions from fabric filter is 0.154 pound per hour and the PM from the extrusion at this line is 0.00002 pound per hour. Therefore, each facility at this CV extrusion line (X005) is in compliance with this rule.

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X006) shall not exceed 0.882 pound per hour when operating at a process weight rate of 202 pounds per hour.

The fabric filter (CE-03) connected to the feed hopper and duster shall be in operation at all times the feed hopper and duster are in operation, in order to comply with this limit. The PM emissions from fabric filter is 0.154 pound per hour and the PM from the extrusion at this line is 0.00002 pound per hour. Therefore, each facility at this CV extrusion line (X006) is in compliance with this rule.

- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X007) shall not exceed 0.882 pounds per hour when operating at a process weight rate of 202 pounds per hour.

The fabric filter (CE-03) connected to the feed hopper and duster shall be in operation at all times the feed hopper and duster are in operation, in order to comply with this limit. The PM emissions from fabric filter is 0.154 pound per hour and the PM from the extrusion at this line is 0.00002 pound per hour. Therefore, each facility at this CV extrusion line (X007) is in compliance with this rule.

- (d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X008) shall not exceed 0.882 pounds per hour when operating at a process weight rate of 202 pounds per hour.

The fabric filter (CE-03) connected to the feed hopper and duster shall be in operation at all times the feed hopper and duster are in operation, in order to comply with this limit. The PM emissions from fabric filters is 0.154 pound per hour and the PM from the extrusion at this line is 0.00002 pound per hour. Therefore, each facility at this CV extrusion line (X008) is in compliance with this rule.

- (e) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X009) shall not exceed 1.40 pounds per hour when operating at a process weight rate of 202 pounds per hour.

ing at a process weight rate of 402 pounds per hour.

The fabric filter (CE-03) connected to the feed hoppers and duster shall be in operation at all times the feed hoppers and duster are in operation, in order to comply with this limit. The PM emissions from fabric filter is 0.154 pound per hour and the PM from the extrusion at this line is 0.00004 pound per hour. Therefore, each facility at this CV extrusion line (X009) is in compliance with this rule.

- (f) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X010) shall not exceed 1.40 pounds per hour when operating at a process weight rate of 402 pounds per hour.

The fabric filter (CE-03) connected to the feed hoppers and duster shall be in operation at all times the feed hoppers and duster are in operation, in order to comply with this limit. The PM emissions from fabric filter is 0.154 pound per hour and the PM from the extrusion at this line is 0.00004 pound per hour. Therefore, each facility at this CV extrusion line (X010) is in compliance with this rule.

- (g) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X011) shall not exceed 1.83 pounds per hour when operating at a process weight rate of 602 pounds per hour.

The fabric filter (CE-03) connected to the feed hoppers and duster shall be in operation at all times the feed hoppers and duster are in operation, in order to comply with this limit. The PM emissions from fabric filter is 0.154 pound per hour and the PM from the extrusion at this line is 0.00007 pound per hour. Therefore, each facility at this CV extrusion line (X011) is in compliance with this rule.

- (h) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X012) shall not exceed 1.40 pounds per hour when operating at a process weight rate of 402 pounds per hour.

The fabric filter (CE-03) connected to the feed hoppers and the fabric filter (CE-05) connected to the duster shall be in operation at all times the feed hoppers and duster are in operation, in order to comply with this limit. The PM emissions from fabric filter (CE-03) is 0.154 pound per hour, the PM emissions from the fabric filter (CE-05) is 0.021 pound per hour and the PM from the extrusion at this line is 0.00004 pound per hour. Therefore, each facility at this CV extrusion line (X012) is in compliance with this rule.

- (i) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the CV extrusion line (X013) shall not exceed 1.40 pounds per hour when operating at a process weight rate of 402 pounds per hour.

The fabric filter (CE-03) connected to the feed hoppers and the fabric filter (CE-06) connected to the duster shall be in operation at all times the feed hoppers and duster are in operation, in order to comply with this limit. The PM emissions from fabric filter (CE-03) is 0.154 pound per hour, the PM emissions from the fabric filter (CE-06) is 0.021 pound per hour and the PM from the extrusion at this line is 0.00004 pound per hour. Therefore, each facility at this CV extrusion line (X013) is in compliance with this rule.

- (j) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the SDM EA extrusion line (X014) shall not exceed 2.91 pounds per hour when operating at a process weight rate of 1,200 pounds per hour.

The fabric filter (CE-04) connected to the sponge extruder feed hopper shall be in operation at all times the feed hopper is in operation, in order to comply with this limit. The PM emissions from fabric filter (CE-04) is 0.193 pound per hour and the PM from the extrusion at this line is 0.00004 pound per hour. Therefore, each facility at this SDM EA extrusion line (X014) is in compliance with this rule.

- (k) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the SDM EB extrusion line (X015) shall not exceed 2.91 pounds per hour when operating at a process weight rate of 1,200 pounds per hour.

The fabric filter (CE-04) connected to the sponge extruder feed hopper shall be in operation at all times the feed hopper is in operation, in order to comply with this limit. The PM emissions from fabric filter (CE-04) is 0.193 pound per hour and the PM from the extrusion at this line is 0.00004 pound per hour. Therefore, each facility at this SDM EB extrusion line (X015) is in compliance with this rule.

- (l) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the SDM EC extrusion line (X016) shall not exceed 2.91 pounds per hour when operating at a process weight rate of 1,200 pounds per hour.

The fabric filter (CE-04) connected to the sponge extruder feed hopper shall be in operation at all times the feed hopper is in operation, in order to comply with this limit. The PM emissions from fabric filter (CE-04) is 0.193 pound per hour and the PM from the extrusion at this line is 0.00004 pound per hour. Therefore, each facility at this SDM EC extrusion line (X016) is in compliance with this rule.

- (m) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the one (1) mixing department (X017) shall not exceed 1.76 pounds per hour when operating at a process weight rate of 567 pounds per hour.

The small baghouse (CE-01) connected to the mixing department shall be in operation at all times the mixing department is in operation, in order to comply with this limit. The PM emissions from baghouse (CE-01) is 0.010 pound per hour. Although the mixing department can comply with this rule using the emission factors from the draft section 4.12 of AP-42, the control device will be required since these are not final emission factors. Therefore, the mixing department (X017) is in compliance with this rule.

- (n) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility at the one (1) mixing department (X018) shall not exceed 1.63 pounds per hour when operating at a process weight rate of 503 pounds per hour.

The baghouse (CE-02) connected to the mixing department shall be in operation at all times the mixing department is in operation, in order to comply with this limit. The PM emissions from the baghouse (CE-02) is 0.008 pound per hour. Although the mixing department can comply with this rule using the emission factors from the draft section 4.12 of AP-42, the control device will be required since these are not final emission factors. Therefore, the mixing department (X018) is in compliance with this rule.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The requirements of 326 IAC 8-1-6 can be applicable to the one (1) spray coating line (X025), seven (7) CV finishing touchup stations (X003), and two (2) silicone application lines (X001 and X019), all constructed after 1980 and all having a potential to emit more than twenty-five (25) tons per year

of VOC. Pursuant to CP 087-9388-00031, issued on January 28, 1999, the VOC usage at the one (1) spray coating line (X025) is be limited to less than twenty-five (25) tons per consecutive twelve (12) month period. Therefore, the potential to emit VOC at the one (1) spray coating line (X025) is limited to less than twenty-five (25) tons per year and the requirements of 326 IAC 8-1-6 are not applicable to that facility. The source provided a Best Available Control Technology Analysis (BACT) for all of the unpermitted emission units at this source. The control technologies explored, and a description of why the technologies are or are not considered feasible by Nishikawa Standard Company, are as follows:

- (a) Material substitution was not considered a viable option for the source at this time because of quality problems created by both water-borne and high solids coatings.
- (b) Air recirculation is not feasible because it is commercially unavailable for small coating operations. According to a representative of a manufacturer of air recirculation systems, air recirculation has only been applied in large coating booths which have a lower line speed, like those in large automotive assembly plants.
- (c) Although carbon adsorption results in the storage, management and disposal of material that may be considered hazardous wastes, this option is considered technologically feasible. The cost of using carbon adsorption was evaluated using the EPA CO\$TAIR approach developed by William Vataavuk. The cost of adding a carbon adsorption system is \$21,304 per ton of VOC removed, allowing for maintenance, cleaning and refilling downtime. Therefore, this control method is economically not feasible.
- (d) Oxidation is technologically feasible at this source. The cost of using regenerative thermal oxidizers was evaluated using the EPA CO\$TAIR approach developed by William Vataavuk. Two (2) different breakdowns were used in computing the cost of using regenerative thermal oxidation. The first method evaluated the cost of control using a single regenerative thermal oxidizer for all VOC emission units. This resulted in a cost of \$6,615 per ton of VOC removed, allowing for maintenance, cleaning and refilling downtime. The second method evaluated the cost of control when grouping emission units based on physical proximity. The cost of control for Group 1, which includes emission units X019 and X023, is \$6,222 per ton of VOC removed, the cost of control for Group 2, which includes emission units X003 and X004, is \$6,137 per ton of VOC removed, the cost of control for Group 3, which includes emission unit X001, is \$6,362 per ton of VOC removed, and the cost of control for Group 4, which includes emission units X020 and X021, is \$27,824 per ton of VOC removed. Therefore, the total cost of all separate groups is \$8,274 per ton of VOC removed. Regenerative thermal oxidation is economically not feasible for this source.

Therefore, BACT for the seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019) is as follows:

- (a) The total VOC usage from all coating and application emission units shall be limited to less than 183 tons per consecutive twelve (12) month period. This is a BACT limit for the seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019). All coating and application emission units are included in this limit to limit VOC from the entire source to less than 250 tons per year and make 326 IAC 2-2 (PSD) not applicable.
- (b) All coating, urethane and silicone application devices at these facilities or shall be drip; high volume, low pressure (HVLP) spray guns; or a coating application device at least as efficient.

- (c) All VOC containing containers shall be kept covered when not in use.

326 IAC 8-2 (Surface Coating Emission Limitations)

Since this source only coats rubber parts, the requirements of 326 IAC 8-2 do not apply.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Since the two (2) insignificant "Safety Kleen" units are cold cleaners with remote solvent reservoir and the cold cleaners were constructed after January 1, 1980, the requirements of 326 IAC 8-3-2, Cold cleaner operation, are applicable. Pursuant to this rule, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Testing Requirements

There is no testing required at this time.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The four (4) spray booths, identified as Lines 2, 3, 5 and 6, have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks (PEV-A27, PEV-A28, PEV-A29 and PEV-A30) while one (1) or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this extruded rubber seals manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 087-7182-00031**.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Page 1 of 11 TSD App A

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Pit ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

X001: One (1) drying oven

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.90

42.92

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.041	0.163	0.013	2.15	0.118	1.80

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X005: One (1) deodorizing furnace and one (1) core metal heater

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.89

16.54

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.016	0.063	0.005	0.827	0.045	0.695

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X006: One (1) deodorizing furnace and one (1) core metal heater

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.89

16.54

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.016	0.063	0.005	0.827	0.045	0.695

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X007: One (1) deodorizing furnace and one (1) core metal heater

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.89

16.54

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.016	0.063	0.005	0.827	0.045	0.695

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

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Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Plt ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

X008: One (1) deodorizing furnace and one (1) core metal heater

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.89

16.54

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.016	0.063	0.005	0.827	0.045	0.695

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X009: One (1) deodorizing furnace

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.59

13.93

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.013	0.053	0.004	0.696	0.038	0.585

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X010: One (1) deodorizing furnace

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.59

13.93

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.013	0.053	0.004	0.696	0.038	0.585

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X011: One (1) deodorizing furnace

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.59

13.93

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.013	0.053	0.004	0.696	0.038	0.585

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Page 3 of 11 TSD App A

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Plt ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

X012: One (1) vulcanizing oven

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.59

13.93

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.013	0.053	0.004	0.696	0.038	0.585

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X013: One (1) vulcanizing oven

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.59

13.93

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.013	0.053	0.004	0.696	0.038	0.585

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X014: One (1) deodorizing furnace and one (1) core metal heater

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.18

27.86

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.026	0.106	0.008	1.39	0.077	1.17

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X015: One (1) deodorizing furnace and one (1) core metal heater

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.18

27.86

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.026	0.106	0.008	1.39	0.077	1.17

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Page 4 of 11 TSD App A

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Pit ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

X016: One (1) deodorizing furnace and one (1) core metal heater

Heat Input Capacity Potential Throughput
MMBtu/hr MMBtu/yr

3.18 27.86

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.026	0.106	0.008	1.39	0.077	1.17

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X019: One (1) drying oven

Heat Input Capacity Potential Throughput
MMBtu/hr MMBtu/yr

2.00 17.52

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.017	0.067	0.005	0.876	0.048	0.736

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X021: One (1) cure oven

Heat Input Capacity Potential Throughput
MMBtu/hr MMBtu/yr

1.00 8.76

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.008	0.033	0.003	0.438	0.024	0.368

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

X025: One (1) preheat oven, one (1) cure oven, one (1) air makeup heater

Heat Input Capacity Potential Throughput
MMBtu/hr MMBtu/yr

5.00 43.80

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.042	0.166	0.013	2.19	0.120	1.84

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Page 5 of 11 TSD App A

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Pit ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.49E-04	1.99E-04	1.25E-02	2.99E-01	5.65E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.31E-05	1.83E-04	2.33E-04	6.32E-05	3.49E-04

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Pit ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (units/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
X001																	
FKJF Recipe	6.58	88.00%	0.0%	88.0%	0.0%	12.00%	0.00086	4080.000	1.000	5.79	5.79	20.32	487.62	88.99	0.00	48.25	100%
X003																	
FKJF Recipe	6.58	88.00%	0.0%	88.0%	0.0%	12.00%	2.12800	1.000	1.000	5.79	5.79	12.32	295.73	53.97	0.00	48.25	100%
X004																	
FKJF Recipe	6.58	88.00%	0.0%	88.0%	0.0%	12.00%	0.60800	1.000	1.000	5.79	5.79	3.52	84.49	15.42	0.00	48.25	100%
X019																	
FKJF Recipe	6.58	88.00%	0.0%	88.0%	0.0%	12.00%	0.00086	4080.000	1.000	5.79	5.79	20.32	487.62	88.99	0.00	48.25	100%
							lbs/hr	hrs/hr									
FKJF Recipe	6.58	88.00%	0.0%	88.0%	0.0%	12.00%	6.61000	1.000	1.000	5.79	5.79	5.82	139.60	25.48	0.10	48.25	75%
X020																	
BB 35062	8.51	80.00%	43.0%	37.0%	43.0%	19.00%	6.61000	1.000	1.000	5.52	3.15	2.45	58.70	10.71	0.91	16.57	75%
X021																	
BB 35062	8.51	80.00%	43.0%	37.0%	43.0%	19.00%	3.30500	1.000	1.000	5.52	3.15	1.22	29.35	5.36	0.46	16.57	75%
X023																	
BB 35062	8.51	80.00%	43.0%	37.0%	43.0%	19.00%	6.61000	1.000	1.000	5.52	3.15	2.45	58.70	10.71	0.91	16.57	75%
X024																	
BB 35062	8.51	80.00%	43.0%	37.0%	43.0%	19.00%	1.32000	1.000	1.000	5.52	3.15	0.49	11.72	2.14	0.18	16.57	75%
Line 4																	
SP-217	8.73	60.20%	49.8%	10.4%	52.2%	34.70%	3.97000	1.000	1.000	1.90	0.91	0.41	9.91	1.81	1.55	2.62	75%
Line 7																	
SP-217	8.51	80.00%	43.0%	37.0%	43.0%	19.00%	11.90000	1.000	1.000	5.52	3.15	4.40	105.67	19.29	1.64	16.57	75%
Small Robot																	
SP-217	8.51	80.00%	43.0%	37.0%	43.0%	19.00%	1.32000	1.000	1.000	5.52	3.15	0.49	11.72	2.14	0.18	16.57	75%
State Potential Emissions																	
Add worst case coating to all solvents																	
												74.2	1781	325	5.94		

Control Technology Emissions (Combustion)						Emission Factors							Emissions				
Type	Number	Capacity MMBtu/hr	Gas usage MMCF/yr	PM lb/MMCF	PM10 lb/MMCF	SO2 lb/MMCF	NOx lb/MMCF	VOC lb/MMCF	CO lb/MMCF		PM tons/yr	PM10 tons/yr	SO2 tons/yr	NOx tons/yr	VOC tons/yr	CO tons/yr	
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0		0.0	0.0	0.0	0.0	0.0	0.0	
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0		0.0	0.0	0.0	0.0	0.0	0.0	
Total			0.0								0.0	0.0	0.0	0.0	0.0	0.0	
										Control Efficiency		Controlled	Controlled	Controlled	Controlled		
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate		
						X001, X002,X003, X004, X019, X020,X021,X023					0	0	per hour	per day	tons/yr	tons/yr	
						X024					0	0.95					
						Line 4, Line 7 and Small Robot					0	0.90	74.2	1781	325	2.73	
Controlled Emissions due to Surface Coating Operations and Controls																	

Controlled Emissions due to Surface Coating Operations and Controls

Line 4, Line 7 and Small Robot

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off

Total = Worst Coating + Sum of all solvents used

Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: 087-7182
Plt ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
X025																	
H792C	7.20	100.00%	0.0%	100.0%	0.0%	0.00%	0.00120	195.000	1.000	7.20	7.20	1.68	40.3	7.36	0.00	n/a	75%
UNISTOLE P 401	7.34	95.00%	0.0%	95.0%	0.0%	0.00%	0.00071	195.000	1.000	6.97	6.97	0.97	23.3	4.25	0.06	n/a	75%
Oflex Hardener EH-47	8.59	54.50%	0.0%	54.5%	0.0%	1.00%	0.00019	195.000	1.000	4.68	4.68	0.17	4.14	0.76	0.16	468	75%
FUM Primer Blend	7.37	93.53%	0.00%	93.5%	0.0%	0.09%	0.00210	195.000	1.000	6.89	6.89	2.82	67.7	12.4	0.21	7659	75%
ST 97 PA	7.51	50.00%	0.0%	50.0%	0.0%	50.00%	0.00009	195.000	1.000	3.75	3.75	0.06	1.55	0.28	0.07	7.51	75%
H792C	7.20	100.00%	0.0%	100.0%	0.0%	0.00%	0.00141	195.000	1.000	7.20	7.20	1.98	47.4	8.65	0.00	n/a	75%
Oflex Hardener EH-47	8.59	54.50%	0.0%	54.5%	0.0%	1.00%	0.00026	195.000	1.000	4.68	4.68	0.24	5.78	1.06	0.22	468	75%
Oflex No. 100 H-5	8.01	74.00%	0.0%	74.0%	0.0%	25.00%	0.00264	195.000	1.000	5.93	5.93	3.05	73.2	13.4	1.17	23.7	75%
FUM Coating Blend	7.77	79.94%	0.00%	79.9%	0.0%	16.1%	0.00440	195.000	1.000	6.21	6.21	5.33	128	23.4	1.46	38.7	75%

State Potential Emissions

Add worst case coating to all solvents

8.16	196	35.7	1.68
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Control Technology Emissions (Combustion)						Emission Factors										
Type	Number	Capacity MMBtu/hr	Gas usage MMCF/yr	PM lb/MMCF	PM10 lb/MMCF	SO2 lb/MMCF	NOx lb/MMCF	VOC lb/MMCF	CO lb/MMCF		PM tons/yr	PM10 tons/yr	Emissions SO2 tons/yr	NOx tons/yr	VOC tons/yr	CO tons/yr
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0		0.0	0.0	0.0	0.0	0.0	0.0
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0		0.0	0.0	0.0	0.0	0.0	0.0
Total			0.0								0.0	0.0	0.0	0.0	0.0	0.0
										Control Efficiency		Controlled	Controlled	Controlled	Controlled	
										VOC	PM	VOC pounds	VOC pounds	VOC tons/yr	Particulate	
										0	0.95	per hour	per day	tons/yr	tons/yr	

Controlled Emissions due to Surface Coating Operations and Controls

8.16	196	35.7	0.084
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Page 8 of 11 TSD App A

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Plt ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Weight % Xylenes	Glycol Ethers Emissions (tons/yr)	Xylenes Emissions (tons/yr)
X001							
FKJF Recipe	6.58	0.00086	4080.000	0.00%	13.15%	0.00	13.30
X003				0.00%	0.00%	0.00	0.00
FKJF Recipe	6.58	2.12800	1.000	0.00%	13.15%	0.00	8.06
X004				0.00%	0.00%	0.00	0.00
FKJF Recipe	6.58	0.60800	1.000	0.00%	13.15%	0.00	2.30
X019				0.00%	0.00%	0.00	0.00
FKJF Recipe	6.58	0.00086	4080.000	0.00%	13.15%	0.00	13.30
		lbs/hr	hrs/hr	0.00%	0.00%	0.00	0.00
FKJF Recipe	6.58	6.61000	1.000	0.00%	13.15%	0.00	3.81
X020				0.00%	0.00%	0.00	0.00
BB 35062	8.51	6.61000	1.000	2.00%	0.00%	0.58	0.00
X021				0.00%	0.00%	0.00	0.00
BB 35062	8.51	3.30500	1.000	2.00%	0.00%	0.29	0.00
X023				0.00%	0.00%	0.00	0.00
BB 35062	8.51	6.61000	1.000	2.00%	0.00%	0.58	0.00
X024				0.00%	0.00%	0.00	0.00
BB 35062	8.51	1.32000	1.000	2.00%	0.00%	0.12	0.00
Line 4							
SP-217	8.73	3.97000	1.000	4.60%	0.40%	0.80	0.07
Line 7							
SP-217	8.51	11.90000	1.000	4.60%	0.40%	2.40	0.21
Small Robot							
SP-217	8.51	1.32000	1.000	4.60%	0.40%	0.27	0.02
Totals:						5.03	41.1
Overall Total:						46.1	

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
HAP Emission Calculations**

**Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Plt ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996**

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Total HAP Emissions (tons/yr)
X025											
H792C	7.20	0.00120	195.000	1.00	0.00%	90.00%	9.00%	0.00	6.62	0.66	7.28
UNISTOLE P 401	7.34	0.00071	195.000	1.00	0.00%	95.00%	0.00%	0.00	4.25	0.00	4.25
Oflex Hardener EH-47	8.59	0.00019	195.000	1.00	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
ST 97 PA	7.51	0.00009	195.000	1.00	0.00%	50.00%	0.00%	0.00	0.28	0.00	0.28
H792C	7.20	0.00141	195.000	1.00	0.00%	90.00%	9.00%	0.00	7.79	0.78	8.57
Oflex Hardener EH-47	8.59	0.00026	195.000	1.00	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Oflex No. 100 H-5	8.01	0.00264	195.000	1.00	22.00%	0.00%	22.00%	3.97	0.00	3.97	7.95

TOTALS:	(tons/yr):	3.97	18.9	5.41	28.3
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METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Process Operations

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Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Plt ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

Emission Unit	Unit ID	Stack	Flow Rate (acfm)	Outlet Grain Loading (gr/acfm)	PM Controlled Emission Rate (lbs/hr)	PM Controlled Emission Rate (tons/yr)	Control Efficiency	PM Potential Emissions (lbs/hr)	PM Potential Emissions (tons/yr)
Dusters and hoppers (X005 - X011) & hoppers (X012 & X013)	CE-03	PEF-A2	600	0.03	0.154	0.676	90.0%	1.54	6.76
Dusters (X012)	CE-05	none	80	0.03	0.021	0.090	99.0%	2.06	9.01
Dusters (X013)	CE-06	none	80	0.03	0.021	0.090	99.0%	2.06	9.01
Sponge extruder feed hopper (X014, X015 & X016)	CE-04	PEF-B5	750	0.03	0.193	0.845	90.0%	1.93	8.45
				Totals:	0.388	1.70		7.59	33.2

Methodology

Controlled Emissions (lbs/hr) = gr/acfm x acfm x 60 minutes/hr / 7000 gr/lb

Uncontrolled Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1 - Control Efficiency)

Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hrs/yr / 2000 lbs/ton

Other Emissions from Rubber Parts Manufacturing

	Rubber Throughput (lbs/hr)	VOC Emission Factor (lbs/lb rubber)	VOC (lbs/hr)	VOC (tons/yr)	Total HAPs Emission Factor (lbs/lb rubber)	HAPs (lbs/hr)	HAPs (tons/yr)	PM Emission Factor (lbs/lb rubber)	PM (lbs/hr)	PM (tons/yr)	PM Control Efficiency	PM after controls (lbs/hr)	PM after controls (tons/yr)
Extruding (X005)	200	1.60E-04	0.032	0.140	7.52E-05	0.015	0.066	1.12E-07	2.24E-05	9.81E-05	0.00%	2.24E-05	9.81E-05
Extruding (X006)	200	1.60E-04	0.032	0.140	7.52E-05	0.015	0.066	1.12E-07	2.24E-05	9.81E-05	0.00%	2.24E-05	9.81E-05
Extruding (X007)	200	1.60E-04	0.032	0.140	7.52E-05	0.015	0.066	1.12E-07	2.24E-05	9.81E-05	0.00%	2.24E-05	9.81E-05
Extruding (X008)	200	1.60E-04	0.032	0.140	7.52E-05	0.015	0.066	1.12E-07	2.24E-05	9.81E-05	0.00%	2.24E-05	9.81E-05
Extruding (X009)	400	1.60E-04	0.064	0.280	7.52E-05	0.030	0.132	1.12E-07	4.48E-05	1.96E-04	0.00%	4.48E-05	1.96E-04
Extruding (X010)	400	1.60E-04	0.064	0.280	7.52E-05	0.030	0.132	1.12E-07	4.48E-05	1.96E-04	0.00%	4.48E-05	1.96E-04
Extruding (X011)	600	1.60E-04	0.096	0.420	7.52E-05	0.045	0.198	1.12E-07	6.72E-05	2.94E-04	0.00%	6.72E-05	2.94E-04
Extruding (X012)	400	1.60E-04	0.064	0.280	7.52E-05	0.030	0.132	1.12E-07	4.48E-05	1.96E-04	0.00%	4.48E-05	1.96E-04
Extruding (X013)	400	1.60E-04	0.064	0.280	7.52E-05	0.030	0.132	1.12E-07	4.48E-05	1.96E-04	0.00%	4.48E-05	1.96E-04
Extruding (X014)	400	1.60E-04	0.064	0.280	7.52E-05	0.030	0.132	1.12E-07	4.48E-05	1.96E-04	0.00%	4.48E-05	1.96E-04
Extruding (X015)	400	1.60E-04	0.064	0.280	7.52E-05	0.030	0.132	1.12E-07	4.48E-05	1.96E-04	0.00%	4.48E-05	1.96E-04
Extruding (X016)	400	1.60E-04	0.064	0.280	7.52E-05	0.030	0.132	1.12E-07	4.48E-05	1.96E-04	0.00%	4.48E-05	1.96E-04
Hot Air Curing (X005)	200	2.49E-03	0.498	2.18	3.46E-03	0.692	3.03	N/A	N/A	N/A	N/A	N/A	N/A
Hot Air Curing (X006)	200	2.49E-03	0.498	2.18	3.46E-03	0.692	3.03	N/A	N/A	N/A	N/A	N/A	N/A
Hot Air Curing (X007)	200	2.49E-03	0.498	2.18	3.46E-03	0.692	3.03	N/A	N/A	N/A	N/A	N/A	N/A
Hot Air Curing (X008)	200	2.49E-03	0.498	2.18	3.46E-03	0.692	3.03	N/A	N/A	N/A	N/A	N/A	N/A
Hot Air Curing (X009)	400	2.49E-03	0.996	4.36	3.46E-03	1.38	6.06	N/A	N/A	N/A	N/A	N/A	N/A
Hot Air Curing (X010)	400	2.49E-03	0.996	4.36	3.46E-03	1.38	6.06	N/A	N/A	N/A	N/A	N/A	N/A
Hot Air Curing (X011)	600	2.49E-03	1.494	6.54	3.46E-03	2.08	9.09	N/A	N/A	N/A	N/A	N/A	N/A
Autoclave Curing (X012)	400	6.15E-03	2.460	10.8	6.04E-03	2.42	10.6	N/A	N/A	N/A	N/A	N/A	N/A
Autoclave Curing (X013)	400	6.15E-03	2.460	10.8	6.04E-03	2.42	10.6	N/A	N/A	N/A	N/A	N/A	N/A
Hot Air Curing (X014)	400	2.49E-03	0.996	4.36	3.46E-03	1.38	6.06	N/A	N/A	N/A	N/A	N/A	N/A
Hot Air Curing (X015)	400	2.49E-03	0.996	4.36	3.46E-03	1.38	6.06	N/A	N/A	N/A	N/A	N/A	N/A
Hot Air Curing (X016)	400	2.49E-03	0.996	4.36	3.46E-03	1.38	6.06	N/A	N/A	N/A	N/A	N/A	N/A
Mixing and Milling (X017)	562	4.44E-04	0.250	1.09	1.40E-04	0.079	0.345	9.25E-04	0.520	2.28	98.00%	0.010	0.046
Mixing and Milling (X018)	417	4.44E-04	0.185	0.810	1.40E-04	0.058	0.256	9.25E-04	0.385	1.69	98.00%	0.008	0.034
		Totals:	14.5	63.5		17.0	74.7		0.906	3.97		0.019	0.081

Emission Factors from Tables 4.12-6, 4.12-8 and 4.12-4 of AP-42 draft Section 4.12
Emission factors are for the worst case compound for each pollutant.

Appendix A: Emission Calculations

HAP Emission Calculations
Individual HAP emissions when using worst case total HAP materials

Company Name: Nishikawa Standard Company
Address City IN Zip: 324 Morrow Street, Topeka, Indiana 46571
Part 70: T 087-7182
Plt ID: 087-00031
Reviewer: CarrieAnn Ortolani
Date: November 15, 1996

Hot Air Curing

HAP	Worst Case Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
1,1,1 Trichloroethane	1.48E-06	3400	0.005	0.022
2-Butanone (MEK)	2.56E-05	3400	0.087	0.381
Acetophenone	3.58E-07	3400	0.001	0.005
Aniline	1.26E-05	3400	0.043	0.188
bis(2-Ethylhexyl)phthalate	5.92E-08	3400	0.000	0.001
Chloroethane	4.95E-06	3400	0.017	0.074
Chloromethane	2.18E-05	3400	0.074	0.325
Cumene	2.32E-07	3400	0.001	0.003
Ethyl Acrylate	1.16E-04	3400	0.394	1.73
Hexane	2.78E-03	3400	9.452	41.4
Xylenes	2.42E-05	3400	0.082	0.360
Methylene Chloride	4.08E-04	3400	1.387	6.08
Naphthalene	9.87E-07	3400	0.003	0.015
Phenol	3.13E-05	3400	0.106	0.466
Toluene	2.55E-05	3400	0.087	0.380

Autoclave Curing

HAP	Worst Case Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
1,4 Dichlorobenzene	2.53E-08	800	0.00002	0.0001
2-Butanone (MEK)	1.24E-06	800	0.001	0.004
2-Methylphenol	6.93E-09	800	0.00001	0.00002
Acetylaldehyde	3.22E-07	800	0.000	0.001
Acetophenone	9.76E-08	800	0.0001	0.0003
Benzene	2.07E-05	800	0.017	0.073
Biphenyl	3.14E-08	800	0.00003	0.0001
bis(2-Ethylhexyl)phthalate	2.73E-07	800	0.0002	0.001
Carbon Disulfide	5.93E-03	800	4.74	20.8
Carbonyl Sulfide	4.17E-05	800	0.033	0.146
Cumene	1.46E-06	800	0.001	0.005
Dibenzofuran	2.81E-09	800	0.000002	0.00001
Dimethylphthalate	3.02E-09	800	0.000002	0.00001
Epichlorohydrin	1.85E-06	800	0.001	0.006
Ethylbenzene	2.55E-06	800	0.002	0.009
Hexane	3.22E-06	800	0.003	0.011
Isooctane	5.23E-07	800	0.000	0.002
Xylenes	1.68E-05	800	0.013	0.059
Naphthalene	1.64E-07	800	0.0001	0.001
Phenol	4.75E-08	800	0.00004	0.0002
Styrene	1.86E-07	800	0.0001	0.001
t-Butyl Methyl Ether	7.31E-09	800	0.00001	0.00003
Toluene	1.59E-05	800	0.013	0.056

Mixing and Milling

HAP	Worst Case Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
1,1,1 Trichloroethane	6.03E-08	979	0.00006	0.00026
2-Butanone (MEK)	1.04E-06	979	0.00102	0.00446
Acetophenone	1.45E-08	979	0.00001	0.00006
Aniline	5.13E-07	979	0.00050	0.00220
Benzene	4.62E-08	979	0.00005	0.00020
bis(2-Ethylhexyl)phthalate	2.40E-09	979	0.000002	0.00001
Cadmium Compounds	2.65E-09	979	0.000003	0.00001
Chloroethane	2.01E-07	979	0.00020	0.00086
Chloromethane	8.86E-07	979	0.00087	0.00380
Chromium Compounds	4.20E-08	979	0.00004	0.00018
Cumene	9.43E-09	979	0.00001	0.00004
Ethyl Acrylate	1.45E-07	979	0.00014	0.00062
Hexane	1.13E-04	979	0.11063	0.48455
Xylenes	1.06E-06	979	0.00104	0.00455
Methylene Chloride	1.65E-05	979	0.01615	0.07075
Naphthalene	4.01E-08	979	0.00004	0.00017
Nickel Compounds	3.21E-08	979	0.00003	0.00014
Phenol	1.27E-06	979	0.00124	0.00545
Tetrachloroethene	4.10E-06	979	0.00401	0.01758
Toluene	1.04E-06	979	0.00102	0.00446

Extruding

HAP	Worst Case Emission Factor (lb/lb rubber)	Potential Rubber Throughput (lbs/hr)	Potential Emissions (lbs/hr)	Potential Emissions (tons/yr)
1,1,1 Trichloroethane	3.23E-08	4200	0.0001	0.001
2-Butanone (MEK)	5.57E-07	4200	0.002	0.010
Acetophenone	7.79E-09	4200	0.0000	0.0001
Aniline	2.75E-07	4200	0.001	0.005
bis(2-Ethylhexyl)phthalate	1.29E-09	4200	0.00001	0.00002
Chloroethane	1.08E-07	4200	0.000	0.002
Chloromethane	4.75E-07	4200	0.002	0.009
Chromium	2.59E-09	4200	0.00001	0.00005
Cumene	5.05E-09	4200	0.00002	0.0001
Ethylacrylate	2.53E-06	4200	0.011	0.047
Hexane	6.05E-05	4200	0.254	1.11
Xylenes	5.28E-07	4200	0.002	0.010
Methylene Chloride	8.87E-06	4200	0.037	0.163
Naphthalene	2.15E-08	4200	0.00009	0.0004
Nickel	1.98E-09	4200	0.00001	0.00004
Phenol	6.80E-07	4200	0.003	0.013
Toluene	5.55E-07	4200	0.002	0.010

Emission Factors from Tables 4.12-6, 4.12-9, 4.12-10 and 4.12-4 of AP-42 draft Section 4.12
These calculations are for the maximum potential emissions of each individual HAP considering the compounds used at this source.